



November 13, 2006

RECEIVED

Mr. Charlie Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, South Carolina 29210

NOV 13 2006

PSC SC
MAIL / DMS

RE: Proposed Changes to Article 3 of the Commission's Rules and Regulations

Dear Mr. Terreni:

After reviewing Article 3 it appears to me that the terms "utility" and "electric system" do not need to be defined. In fact, I am not sure these terms need to be used at all in the regulations. The terms "electrical utility" and "electric supplier" seem to be all that is needed. In addition, there needs to be more consistency in the use of the term "electrical utility."

Rule 103-304, the first paragraph refers to "electric systems." It appears to me that the better term is "electric supplier." That is the term used in the second paragraph which is the first numbered paragraph.

Regarding Rule 103-316, assuming the rule is not deleted, it first references a "utility," then it speaks of an "electric utility." "Electric utility" is not a defined term. It seems to me that the correct term in both situations is "electric supplier" as the Commission has jurisdiction over complaints against electrical utilities, electric cooperatives and municipalities providing electric service outside their borders.

Rule 103-317 refers to "the utility," the use of the term "electrical utility" would be better.

Regarding Rule 103-330a, I think it would be helpful for this rule to apply to both electrical utilities and cooperatives so that both have a duty to maintain up-to-date maps of their facilities and territory so that they can properly advise customers of their respective service rights.

Regarding Rule 103-339.4, "Electrical Utility" should be "electrical utility."

Regarding Rule 103-341.2, the term should be "electrical utility" instead of "electric system." Only electrical utilities are required to file and keep current with the

Commission tariffs and service regulations. Plus, Rule 103-341.3 refers to "electrical utility."

Throughout Rule 103-342, it refers to "utility." The better reference is to "electrical utility."

Turning to Rule 103-345, since complaints can be filed against cooperatives, the Commission should consider changing "electrical utility" to "electric supplier."

Regarding Rule 103-348, while it makes sense for cooperatives to have to extend service to serve all customers in their assigned territories upon request, thus the use of the term "electric supplier" seems correct, since cooperatives do not file their tariffs or service regulations with the Commission, the rule is somewhat unenforceable against cooperatives.

Finally, PEC shares SCE&G's concerns with the proposed changes to Rule 103-315.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Len S. Anthony".

Len S. Anthony
Deputy General Counsel – Regulatory Affairs

LSA:mhm

240694